

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

LATOYA STUART, SYLVIA  
MATTHEWS, MARIAN PAYNE, AND  
BILLY KELLY,

Plaintiffs,

v.

RAYTHEON TECHNOLOGIES CORP.,

Defendant.

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Civil Action No.: 3:22-cv-02675-M

**REPLY IN SUPPORT OF DEFENDANT’S OPPOSED MOTION  
FOR LEAVE TO FILE A SEPARATE DISPOSITIVE MOTION**

Raytheon Company (“Raytheon”), by and through its counsel, respectfully submits this Reply in Support of Defendant’s Opposed Motion for Leave to File a Separate Dispositive Motion Against Each Plaintiff as follows:

1. In their Response (Dkt. 164), Plaintiffs argue that “Plaintiffs are all similarly situated, as are their comparators[,]” that the adverse actions taken against Plaintiffs are similar, and that Raytheon’s justification for taking those actions are similar. (Dkt. 164 at 2). Yet the fact that Plaintiffs claim they were similarly situated with respect to the comparators who were selected/hired for the position at issue does not address, let alone rebut, the fact that each Plaintiff asserts individual (not collective or class-action) claims and that each Plaintiff’s claim and the corresponding evidence relevant to each claim (including, at the summary judgment stage, evidence relating to the *prima facie* case, pretext, and whether each Plaintiff was “clearly better qualified” than each of the employees selected and other employers not selected who were ranked ahead of them) must be analyzed on a case-by-case and individualized basis. Likewise, because Plaintiffs are asserting individual claims, to avoid summary judgment each Plaintiff

must produce substantial evidence establishing a genuine issue of material fact regarding pretext and the “clearly better qualified” standard.

2. Plaintiffs also point to the allegedly short “time frame for the facts” to support their opposition to Raytheon’s request for leave to file separate dispositive motions. However, this argument does not address the propriety of filing separate dispositive motions, does not address the specific, individualized facts at issue relating to the reasons why each Plaintiff and their comparators were and were not selected, and is more relevant to a request to extend the page limits.

For the reasons stated in Raytheon’s Motion for Leave to File a Separate Dispositive Motion Against Each Plaintiff and herein, the Court should grant Raytheon’s Motion for Leave to File a Separate Dispositive Motion Against Each Plaintiff and permit Raytheon to file a separate dispositive motion with respect to each of the Plaintiff’s claims. In the alternative, if the Court will not permit separate motions, Raytheon respectfully requests an extension of the page limit for a comprehensive combined motion/brief up to 60 pages.

DATED: February 11, 2025

Respectfully submitted,

SEYFARTH SHAW LLP

By: /s/ Esteban Shardonofsky

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**ATTORNEYS FOR DEFENDANT,  
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**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on February 11, 2025, a true and correct copy of the foregoing document was electronically filed with the Clerk of the Court via the Court's CM/ECF System which sent electronic notification of such filing to counsel of record.

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